

From: shirledc@artelco.com

Sent: Saturday, April 22, 2006 3:43 PM

To: Frances, Valerie

Cc: cvof@iquest.net%inter2; obn@hotlineprinting.com%inter2

Subject: more proxies

Attachments: ATTACHMENT.TXT

Ms. Frances....after I returned home from the NOSB meeting on April 20 I had more proxies supporting our position for using food grade cheese wax in certified log-grown Shiitake production in my e mail box. Since I handed my petition and printed statement to you I assume you are the one to receive additional proxies for inclusion in our folder. Please process these additional comments from Allan Benjamin of the Missouri Dept. Agriculture and Dr. Catherine Sabota, Alabama A&M University. Thanks. tom e. kimmons, Dir., Shiitake Mushroom Center

April 18, 2006

National Organic Standards Board

c/o Katherine Benham

Room 4008 - South Building

1400 and Independence Avenue, SW

Washington, D.C. 20250-0001.

Fax (202) 205-7808

National Organic Standards Board,

I am writing on behalf of two organic shiitake mushroom growers in Missouri. Recently these growers were

informed by their USDA NOP accredited certifier that the FDA cheese wax that they are using is no longer an

acceptable material for organic production of shiitake mushrooms.

These growers, Nicola Macpherson of Ozark Forest Mushrooms and Earnie Bohner of Persimmon Hill have

tremendous integrity in their operations and take great pride in producing the highest quality of organic shiitake

mushrooms. I would like to reassure the NOSB board that these growers would not knowingly use a prohibited

material that would threaten the organic integrity of the shiitake mushrooms.

As far as the FDA cheese wax issue, a similar situation was before the NOSB involving oils (horticultural). The

issue was that the natural product replacement was not known to be appropriate or effective. While not an exact

corollary, by not being able to use the cheese wax it will leave the shiitake growers without an adequate natural

alternative just as the crops committee saw in the oils situation.

Crops Committee Final Recommendation March 17, 2006

I. List: 205.601 Synthetic substances allowed for use in organic crop production

II. Category Use

(e) As insecticides (including acaricides or mite control).

(i) As plant disease control.

III. Committee Summary: Pertaining to oils (horticultural), comments were received saying that natural alternatives were available as replacements.

Vegetable oils were mentioned as the natural product replacement, but were questioned to see if these are appropriate and effective. According to a

representative of one California organic certifier, all the vegetable oil formulations for crop protection use have synthetic emulsifiers in them. Without the

emulsifier, the oils would not work as a spray material for crops. It could be argued that these products would not be wholly natural substitutes. Further

comments were received stating that multi-year grower comparative tests between vegetable oil products and the petroleum derived oils showed that the

vegetable oils did not control certain target pests adequately. Research data that could verify the claim that the vegetable oil alternatives are truly adequate

as a replacement is needed.

IV. Committee Recommendation:

Recommendations based upon comments received- 205.601(e) and (i)

The Crops Committee recommends the renewal of the following material in these categories of uses:

(e) As insecticides (including acaricides or mite control).

(6) Oils, horticultural- narrow range oils as dormant, suffocating, and summer oils.

(i) As plant disease control.

(6) Oils, horticultural- narrow range oils as dormant, suffocating, and summer oils.

Moved: Rigoberto Delgado Second: Jeff Moyer Committee vote: 3-1 Absent: Ostiguy Board vote:

My question for the NOSB Crops Committee is by using the cheese wax in this manner does it threaten the

organic integrity of the shiitake mushrooms. I am sure the NOSB will resolve this issue in a way that protects the

organic consumers while not harming the organic growers of Missouri.

Sincerely,

Allan Benjamin

Allan Benjamin

P. O. Box 69
Normal, AL 35762

To Whom It May Concern:

I have been conducting research on shiitake mushrooms At Alabama A&M University for 16 years. During that time we have almost exclusively used cheese wax as a sealant for log inoculation sites. Cheese wax is derived, through a natural process, from the ground, from oil, a natural product. There is no other more natural product that works as well and is as safe. Even bees wax is a hazard as it attracts

bees while you are heating it and subjects workers to potential bee stings.

My research into this product has revealed that it is certified organic by the Organic Crop Improvement Association International, Inc., for International Certification Standards for Organic Foods and Food Products as well as the Mississippi Organic Farming Regulations and numerous other organic certification organizations.

Cheese wax, when used for shiitake production, is not an input into the production of the mushrooms. It is no different than covering a stack of logs with plastic. The mushrooms I have harvested have never had a wax residue on them and quite often the wax peels off before the first harvest. The contact that the mushrooms have with the wax is LESS than the contact they might have in a plastic wrapped container used for shipping or display in a supermarket.

The shiitake mushroom industry is growing and provides a valuable product to consumers. Our research has shown that mushrooms grown on logs have as much as THREE times the medicinal value of mushrooms grown on artificial or sawdust substrate blocks. We are, in fact conducting a conference on April 20, 2006, to demonstrate and promote the use of log grown shiitake mushrooms over substrate grown mushrooms. The results of our research imply great potential for the medicinal use of log grown mushrooms. If cheese wax is removed from the approved organic certification use list, it will not only be a hardship on producers, but it will significantly increase the cost of production and even encourage producers to grow mushrooms of inferior medicinal quality.

If I can provide further assistance, please feel free to contact me at 256.372.4257.

Cathy Sabota, Professor/Horticulturist
Department of Plant and Soil Science
Alabama Cooperative Extension System

Alabama A&M University